

Exhibit B-3

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

J.G.,

Plaintiff,

v.

NORTHBROOK INDUSTRIES, Inc.
d/b/a UNITED INN AND SUITES,

Defendant.

CIVIL ACTION FILE

NO. 1:20-cv-5233-SEG

AFFIDAVIT OF RORY A. WEEKS

My name is Rory A. Weeks. I personally appeared before the undersigned officer duly authorized to administer oaths. This is my sworn testimony.

RELEVANT PROFESSIONAL BACKGROUND

- (1) I am of lawful age and suffer from no legal or physical disabilities that prevent me from giving this testimony.
- (2) This affidavit is based on my personal knowledge and the business records of my law firm Andersen, Tate & Carr, P.C.
- (3) In 2008, I graduated from the University of Georgia with a bachelor's degree in philosophy. In 2012, I earned my master's degree in philosophy from the University of Georgia.

- (4) In 2013, I graduated *magna cum laude* from the University of Georgia School of Law, finishing in the top 3 percent of my class and earning the Order of the Coif recognition.
- (5) During law school, I was editor-in-chief of the *Georgia Law Review*. I was also active in moot court, earning the Kerry Harike Joedeke Memorial Award for Excellence (recognizing an outstanding moot court board member). I served as a research assistant to several professors on topics involving complex litigation, corporations, criminal law, administrative law, copyright, civil procedure, and bankruptcy. I also helped a professor draft two merits briefs to the U.S. Supreme Court on behalf of amici curie on the scope of personal jurisdiction (while ostensibly studying for the bar exam).
- (6) As a third-year law student, I took part in the appellate litigation clinic, representing indigent prisoners before the U.S. Courts of Appeals for the Fourth and Eleventh Circuits, including at oral argument in the Eleventh Circuit.
- (7) After law school, I received two federal clerkships. I clerked for the Honorable Joel F. Dubina on the U.S. Court of Appeals for the Eleventh Circuit and the Honorable Timothy C. Batten Sr. on the U.S. District Court for the Northern District of Georgia.
- (8) I am admitted to practice in Georgia, the Northern District of Georgia, Middle District of Georgia, Eleventh Circuit, and Second Circuit.

- (9) After my clerkships, I went to work at a top-tier plaintiff's firm in Atlanta, Georgia. My practice focused on products liability, wrongful death, catastrophic personal injury, complex motions, and appeals. In 2022, I helped found another plaintiff's law firm, and we continued to carry on the same kind of work. The following year, I formed my own firm so that I could focus on helping my wife as she battled a life-threatening health problem.
- (10) In April 2024, I joined Andersen, Tate & Carr, P.C. as a senior counsel. My practice is still heavily plaintiff-focused, and I have worked on several sex-trafficking cases with Pat McDonough and Jon Tonge. This includes a (relatively) minor role in the country's first jury trial in a sex-trafficking case against a hotel. For example, I argued the motion on whether civil liability under the Trafficking Victims Protection Reauthorization Act (TVPRA), 18 U.S.C. § 1595, is joint and several. In the first order on this issue, Judge Calvert agreed. So, too, did this Court. *See* Doc. 204 at 3–4.
- (11) Along with others, I have helped plaintiffs recover more than \$135 million.
- (12) My legal work has received recognition from my peers. For example, *Best Lawyers in America* included me in its “Ones to Watch” list from 2021 to 2024. And *Super Lawyers* named me a “Rising Star” from 2020 to 2024 and “Super Lawyer” in 2025. (While the 2026 Super Lawyers know if they were named, their award isn't public until February 2026.)

MY ROLE IN THIS LITIGATION

- (13) I became involved in this case last summer, when it was well underway. Since that time, I have discussed strategy with other lawyers at ATC as well as at Finch McCraine on many legal issues. I have provided research before, during, and after trial. I have reviewed and revised major motions, including motions in limine. I followed the trial and researched and discussed pertinent legal issues with the trial team during trial. I have also been involved in the insurer's related litigation (now on appeal).
- (14) Because Finch McCrainie and ATC did exemplary work both before and after my involvement, I've spent a small fraction of the time that they did on it.
- (15) A conservative estimate for my hours is included in Exhibit B-4. I arrived at this estimate after reviewing my emails, personal files, the case filings, business records of ATC, among other things.
- (16) Given my background and experience, an hourly rate of \$900 is reasonable.
- (17) The hourly rates of the other attorneys are more than reasonable. These attorneys did what had never been done: obtain a jury verdict in favor of a sex-trafficking victim under the TVPRA. Not a nominal verdict—one for \$40 million. And they did so by working this case hard and well.

My testimony is true and correct and made under penalty of perjury, and I executed this affidavit on September 15, 2025.

Rory A. Weeks, on behalf of,
Rory A. Weeks

This affidavit was sworn to and subscribed before me on September 15, 2025.



Giovanna Menchaca
Notary Public
My Commission Expires: *March 23, 2027*